

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

JOHN STUART,

Defendant.

21-CR-07-LJV-JJM

NOTICE OF MOTION

MOTION BY:

Jeffrey T. Bagley, Assistant Federal Public
Defender

DATE, TIME & PLACE:

Before the Honorable Lawrence J. Vilaro, United
States District Judge, Robert H. Jackson United
States Courthouse, 2 Niagara Square, Buffalo, New
York, **on the papers submitted.**

SUPPORTING PAPERS:

Affirmation of Assistant Federal Public Defender
Jeffrey T. Bagley, dated December 22, 2021.

RELIEF REQUESTED:

A 30-day extension to file Objections to the Report
and Recommendation deadline.

DATED:

Buffalo, New York, December 22, 2021.

Respectfully submitted,

/s/ Jeffrey T. Bagley

Jeffrey T. Bagley
Assistant Federal Public Defender
Federal Public Defender's Office
300 Pearl Street, Suite 200
Buffalo, New York 14202
(716) 551-3341, (716) 551-3346 (Fax)
jeffrey_bagley@fd.org
Counsel for Defendant John Stuart

TO: Laura A. Higgins
Assistant United States Attorney

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AFFIRMATION

JEFFREY T. BAGLEY, affirms under penalty of perjury that:

1. I am an Assistant Federal Public Defender for the Western District of New York and I represent the defendant, John Stuart, in the instant matter.
2. Objections to Magistrate Judge Jeremiah McCarthy's Report and Recommendation (Docket No. 33) are currently due December 29, 2021.
3. I need more time to prepare objections, and therefore respectfully request a 30-day extension of this deadline and agree that the time under the Speedy Trial Act should be excluded during this time.
4. Assistant United States Attorney Laura Higgins has no objection to this request.

DATED: Buffalo, New York, December 22, 2021.

Respectfully submitted,

/s/ Jeffrey T. Bagley

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TO: Laura A. Higgins
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